

**RESPONSE TO COMMENTS  
TECHNICAL MEMORANDUM NO. 7  
SURFACE SOIL SAMPLING AND ANALYSIS PLAN  
ROCKY FLATS PLANT OU 2**

**CDH Comment #1:**

The Division does not understand footnote C on Tables 3-2A and 3-2B. While the text explains that Chromium VI will be included in the analytical suite of only 30 percent of the samples, no restrictions are placed on the remaining metals. In fact, the remainder of these tables suggest that all 49 surface soil samples will be analyzed for metals. The Division will not approve the analytical portion of this plan unless all samples are tested for all metals. We do agree, however, with the limited Chromium VI analysis.

**Response:**

The footnotes on Tables 3-2A and 3-2B have been revised to clarify that Chromium VI will be the only metal analysis limited to 30 percent of the samples. All other samples will be analyzed for the full suite of metals.

**CDH Comments #2:**

The Division believes that Appendix A is a prudent method for determining the analytical sensitivity required to support the Baseline Risk Assessment. However, we do not agree with several of the values proposed for use in the intake estimate equations. On Table A-1, values for HQ, FI, and ME are incorrect. All of these variables should be given a value of 1.0. The same is true for these variables as presented on Tables A-2 and A-3. The values for these variables received extensive discussion on OU 1 and DOE agreed to either remove them from the equation or assign a value of 1.0. This makes the calculated exposure limits presented on Table A-5 incorrect and may necessitate lower detection limits on certain analytes.

**Response:**

The values for HQ, FI, and ME used in Appendix A have been changed to 1.0. The estimated exposure limits in Appendix A have been revised accordingly.